

STATE OF OHIO)
) SS:
COUNTY OF CUYAHOGA)

1:12 MJ 4077

UNITED STATES POSTAL INSPECTION SERVICE

I, MARTIN J. CERNELICH, DO HEREBY DEPOSE AND SAY:

I am a United States Postal Inspector and have been so employed for over 23 years, presently assigned at Cleveland, Ohio to investigate Prohibited Mailing offenses. I have received training in the detection and investigation of drug trafficking. I have worked Prohibited Mailing (Narcotics) investigations for approximately 17 years, during which time I was involved in narcotics investigations leading to prosecution in U. S. District Court as well as state courts.

I know from my training and experience that Express Mail is commonly used to transport controlled substances because the Express Mail system provides traceability and reliable delivery. Further, the expected timeliness of Express Mail places time pressures on law enforcement agents to identify, search and deliver these drug parcels in a timely manner.

On March 27, 2012, Inspectors were contacted by the Collinwood, OH Post Office 44110 concerning a suspected drug parcel originating from Phoenix, AZ 85027 for delivery to Cleveland, OH 44110. Due to the high volume of drug parcels originating from California, Texas and Arizona received for delivery at the Collinwood, OH Post Office 44110, postal management has been instructed to be suspicious of any Priority or Express Mail parcels received from the above described source states. The Collinwood Post Office stated the Express Mail parcel bore a signature waiver, meaning the parcel could be delivered without obtaining a delivery signature. Your affiant knows signature waivers are commonly used on drug parcels so the intended recipients do not have to have contact with the delivery employee and/or law enforcement should the parcel be seized. The Collinwood Post Office stated they had attempted to deliver the parcel on March 27, 2012. The postal supervisor stated when she attempted delivery, a black male answered the door. The supervisor stated she had an Express Mail parcel for Tiffany Hall. The black male stated Tiffany Hall was upstairs and he would take the parcel. The supervisor asked the male to get Tiffany Hall from upstairs and have her come down to sign for the parcel with ID. The male then changed his story and said Tiffany Hall was at work. The supervisor stated she would leave a delivery notice and Tiffany Hall could pick the parcel up with ID at the Post Office later in the day. Later that day, the supervisor reported she received a phone call from an individual purporting to be the mailer of the subject Express Mail parcel. The caller was upset and stated the parcel was a gift for a child. The Postal Service supervisor stated the caller asked for her name and stated, "I know where you're at. I got you," and hung up. Inspectors instructed the Collinwood, OH Post Office to hold the parcel for recovery and further investigation by Postal Inspectors.

On March 29, 2012, Inspectors attempted to contact the individuals associated with the delivery address, but were unsuccessful in contacting anyone at the residence. Inspector Green spoke with the regular carrier servicing the delivery address and learned the name Tiffany Hall was unknown to the carrier at the delivery address. Inspectors subsequently transported the parcel to the offices of the U. S. Postal Inspection Service, Cleveland Field Office, for further investigation.

The subject Express Mail parcel is described U. S. Postal Service Express Mail parcel bearing label no. EH917951319US addressed to Tiffany Hall, 892 E. 143rd Ave, Cleveland, Ohio 44110 with a return address of Brandon Hall, 20440 N 33rd Ave, Phoenix, AZ 85027. The parcel is further described as a brown cardboard box measuring approximately 11" X 6 1/2" X 3 1/2" in size and weighing approximately 1 lbs., 10.8 oz. The subject Express Mail parcel was mailed on March 26, 2012, from the Glendale, AZ Post Office 85308 and bore \$34.45 in U.S. postage.

In furtherance of the investigation, your affiant made inquiries with Accurant, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name and address information, and the U. S. Postal Service Zip+4 database, and learned the return address appeared to be fictitious. Your affiant also made inquiries with Accurant and the Collinwood, OH Post Office 44110 concerning the delivery address and was unable to associate the name Tiffany Hall with the delivery address. Your affiant knows, based on his training and experience, that individuals using the U. S. Mails for the purpose of transporting controlled substances will often place fictitious address and/or name information on these parcels to conceal their true identities from law enforcement should the parcel be seized. Your affiant also knows that Arizona has historically been a major source area for controlled substances mailed into Northern Ohio.

On March 29, 2012, the subject parcel was subjected to "Sammy", a narcotic detection canine handled by Detective Michael Twombly of the Cuyahoga County Sheriff's Department. According to Detective Twombly, Sammy gave a positive alert on the subject parcel. According to Detective Twombly, this positive alert meant Sammy detected the odor of an illegal drug emanating from the parcel.

Detective Twombly has been State Certified as a Narcotics Canine handler and he and narcotics canine Sammy have worked together since 2007. Detective Twombly and canine Sammy were both recertified in March 2011 by the Ohio Peace Officers Training Academy (OPOTA). Detective Twombly and canine Sammy have both completed 200 hours of a state-certified training program at Excel K-9 Services, Inc., in Lyndhurst, Ohio under Certified Trainer Paul J. Shaughnessy of the NAPWDA, a nationally organized police work dog association that provides training for dogs and handlers. During this time, Sammy was trained and certified to alert to the presence of the odors from marijuana, cocaine, heroin, MDEA (methylenedioxyethylamphetamine), MDMA (methylenedioxymethamphetamine), methamphetamine ("crystal meth"), and/or their derivatives. Detective Twombly has been trained how to handle a detector K-9 and read his alerts.

Based on the information contained herein, your affiant maintains there is probable cause to believe that the U. S. Postal Service Express Mail parcel bearing label no. EH917951319US addressed to Tiffany Hall, 892 E. 143rd Ave, Cleveland, Ohio 44110 with a return address of Brandon Hall, 20440 N 33rd Ave, Phoenix, AZ 85027 contains controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).



MARTIN J. CERNELICH
POSTAL INSPECTOR

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 29th DAY OF MARCH, 2012, AT
CLEVELAND, CUYAHOGA COUNTY, OHIO



NANCY A. VECCHIARELLI
U. S. MAGISTRATE JUDGE